

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALISON KENT-FRIEDMAN,

Plaintiff,

- against -

THE NEW YORK STATE INSURANCE FUND,  
ERIC MADOFF, WILLIAM O'BRIEN, PETER  
CUSICK, JOHN DORMIN, JOSEPH MULLEN,  
and JOHN and JANE DOE (said names being  
fictitious, the persons intended being those who  
aided and abetted the unlawful conduct of the  
named Defendants),

Defendants.

No. 18-cv-04422  
(VM)(OTW)

**RULE 502(d) ORDER**

WHEREAS, the parties jointly request that this Court issue an order, pursuant to Federal Rule of Evidence 502(d) and the Court's inherent authority, which will allow the parties in this action to conduct and respond to discovery without fear that disclosure of privileged or protected information will automatically waive such privilege or protection in this or any other action or proceeding:

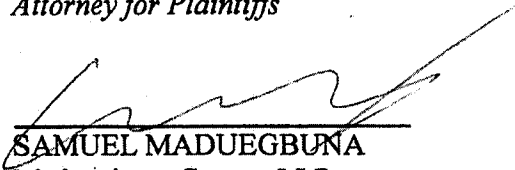
IT IS THEREFORE AGREED BY AND BETWEEN THE PARTIES AND ORDERED  
THAT:

1. The production of privileged or work-product protected documents, electronically stored information ("ESI") or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party's right to conduct a review of documents, ESI, or information (including metadata) for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

Dated: February 10, 2020  
New York, New York


SAMUEL MADUEGBUNA  
*Attorney for Plaintiffs*

  
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SAMUEL MADUEGBUNA  
Maduegbuna Cooper LLP  
Attorneys at Law  
30 Wall Street, 8th Fl  
New York, New York 10005  
Tel: (212) 232-0155

Dated: February 7, 2020  
New York, New York

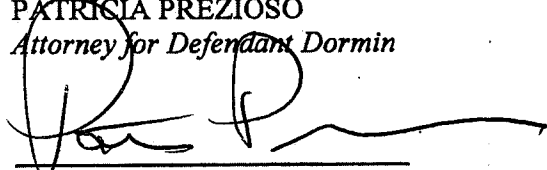
LETITIA JAMES  
Attorney General of the State of New York  
*Attorney for Defendants New York  
State Insurance Fund, Madoff,  
O'Brien, Cusick & Mullen*

By:

  
\_\_\_\_\_  
By: MATTHEW CONRAD  
Assistant Attorney General  
28 Liberty Street, 17th Floor  
New York, New York 10005  
Tel. (212) 416-6352

Dated: February \_\_, 2020  
New York, New York

PATRICIA PREZIOSO  
*Attorney for Defendant Dormin*

  
\_\_\_\_\_  
PATRICIA PREZIOSO  
Porzio Bromberg & Newman P.C.  
100 Southgate Parkway Box 1997  
Morristown, New Jersey 07962

SO ORDERED:

Dated: New York, New York  
Feb. 19, 2020  
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Hon. Ona T. Wang  
United States Magistrate Judge